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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

KHALID ALSHFI,

Plaintiff,

V.

UNITED STATES OF AMERICA, *et al.*,

Defendants.

Case No. 4:24-cv-03908 DMR

**SECOND STIPULATION TO EXTENSION OF
TIME FOR DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT; ORDER**

On November 26, 2024, the Court granted the parties' stipulation for Defendants' motion for summary judgment, setting the due date by December 30, 2024. *See* Dkt.17. Following the Court's order, the parties conferred and stipulate to a further extension of Defendants' motion for summary judgment. The parties make this request because Defendants need additional time to prepare and finalize their motion for summary judgment and the supporting documents that will be submitted with their motion. For these reasons, and as articulated below in the Declaration of Counsel, the parties respectfully request that the Court grant their stipulation.

1 Dated: December 30, 2024

Respectfully submitted,¹

2 ISMAIL J. RAMSEY
United States Attorney

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4 /s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
5 Assistant United States Attorney
6 Attorneys for Defendants

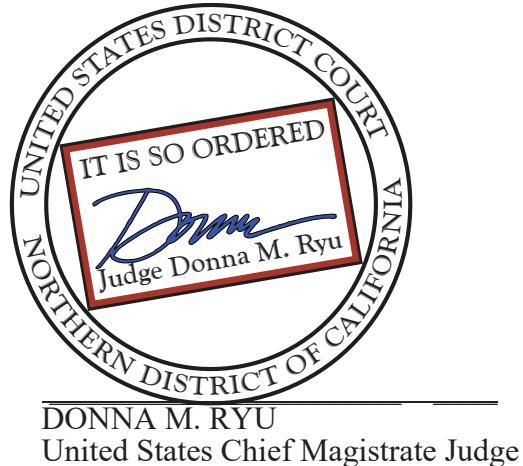
7 Dated: December 30, 2024

8 /s/ Ghassan J. Shamieh
GHASSAN J. SHAMIEH
9 Attorney for Plaintiff

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11
12 **ORDER**

13 Pursuant to stipulation, IT IS SO ORDERED. Defendants will file their motion for summary
14 judgment by January 17, 2025.

15 Date: January 2, 2025



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27 ¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all
signatories listed herein concur in the filing of this document.

1 **DECLARATION OF ELIZABETH D. KURLAN**

2 I, Elizabeth D. Kurlan, declare and state as follows:

3 1. I am an Assistant United States Attorney in the United States Attorney's Office for the
4 Northern District of California and counsel of record for the federal Defendants in the above-captioned
5 action.

6 2. On November 26, 2024, the Court granted the parties' stipulation for Defendants' motion
7 for summary judgment. *See* Dkt. No. 17. Although I diligently have been working on Defendants'
8 motion for summary judgment, I cannot complete it by the current due date because the agency has
9 determined that they will need a brief period of additional time to finalize the supporting documents that
10 will be submitted with Defendants' motion.

11 3. On December 19, 2024, I contacted Plaintiff regarding Defendants' request for a brief
12 extension of time to prepare their motion for summary judgment, and Plaintiff consented to the request.

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct.

15 DATED: December 19, 2024

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17 /s/ *Elizabeth D. Kurlan* _____
18 ELIZABETH D. KURLAN
19 Assistant United States Attorney
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